

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

DINNER TABLE ACTION et al.,

Plaintiffs,

v.

WILLIAM J. SCHNEIDER et al.,

Defendants.

Docket No. 1:24-cv-00430-KFW

**DECLARATION OF HILARY BRASETH  
(pursuant to 28 U.S.C. § 1746)**

I, Hilary Braseth, hereby declare as follows:

1. I am over the age of 18 and reside in Washington, DC.
2. I am the Executive Director of the organization OpenSecrets. OpenSecrets is a nonpartisan, independent, 501(c)(3) non-profit organization dedicated to providing the public with data and analysis concerning money in American politics. I have served as Executive Director since January 2024.
3. Part of OpenSecrets' mission is to collect, clean and create access to quality and timely data on money in politics. We collect this data from public filings made by candidates, political action committees, and other entities that make filings with the Federal Election Commission, with relevant state agencies, or with other relevant government agencies (like agencies that regulate lobbying). We clean the data, deduplicate it, code it, and integrate it into our database, which includes 600 million historical records that date back forty years. The OpenSecrets website, [opensecrets.org](https://opensecrets.org), provides journalists, academics, and members of the public with detailed information concerning publicly reported campaign spending in federal

elections, and other financial political information. OpenSecrets data has been cited in tens of thousands of media articles and published works, including academic articles and books. In 2024, our website received 11 million unique visitors.

4. I was asked by defense counsel in this case to summarize data collected by OpenSecrets concerning contributions and expenditures at the federal level since 2010 by entities that make independent expenditures. I am not receiving any compensation from the defendants for this work.

5. I focused on two types of federal entities that make independent expenditures, super PACs and Carey Committees.

6. A super PAC, also known as an independent expenditure-only committee, is a type of political action committee that came into existence in 2010 following a federal court decision in *SpeechNow.org v. Federal Election Commission*. Super PACs may raise and spend unlimited sums of money for the sole purpose of making independent expenditures to support or oppose political candidates so long as they do not coordinate directly.

7. A Carey Committee is a hybrid political action committee that is not affiliated with a candidate and has the ability to operate both as a traditional PAC, contributing funds to a candidate's committee, and as a super PAC, which makes independent expenditures. To do so, Carey Committees must have a separate bank account for each purpose. The committee can collect unlimited contributions from almost any source for its independent expenditure account, but may not use those funds for its traditional PAC contributions. It is possible that a Carey Committee accepts unlimited contributions for its independent expenditure account but does not end up making any independent expenditures.

8. The report attached as Exhibit A compiles and summarizes various data maintained by OpenSecrets regarding trends in contributions to and expenditures by super PACs and Carey Committees since 2010. I oversaw the creation of this report, working with a volunteer and OpenSecrets staff. I have reviewed the data contained in the report and can confirm that it accurately reflects the data maintained by OpenSecrets and originating from the Federal Election Commission. If called to testify, I could and would competently testify to the statements above and in the attached report.

9. The data reported in Exhibit A combine super PAC data and Carey Committee data where noted. The data include all contributions to the super PAC and non-super PAC arms of Carey Committees as reported, regardless of whether the committees made independent expenditures. OpenSecrets makes best efforts to exclude Carey Committees that only received contributions to the non-super PAC arms. The data in the report on spending by super PACs and Carey Committees show only independent expenditures.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: February 14, 2025

/s/ Hilary Braseth  
Hilary Braseth  
Executive Director  
OpenSecrets